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November 1, 1999

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 3660
Jefferson City, Missouri 65102

FILED
NOV - 1 1999
Missouri Public
Service Commission

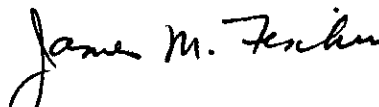
RE: Proposed Recission and Modification of 4 CSR 240-2.080
Case No. AX-2000-116

Dear Mr. Roberts:

Enclosed, for filing in the above-referenced matter, are the original and fourteen (14) copies of the Comments of GTE Midwest Incorporated. A copy of the foregoing document has been hand-delivered or mailed this date to parties of record.

Thank you for your attention to this matter.

Sincerely,


James M. Fischer

/jr
Enclosures

cc: Office of the Public Counsel
Dan Joyce

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED
NOV - 1 1999
Missouri Public
Service Commission

In the Matter of the Proposed Recission and)
Modification of 4 CSR 240-2.080.)

Case No. AX-2000-116

COMMENTS OF GTE MIDWEST INCORPORATED

Comes now GTE Midwest Incorporated ("GTE") and respectfully submits the following
Comments regarding the proposed changes to 4 CSR 240-2.080 in this proceeding:

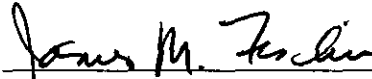
1. In the October 1, 1999, edition of the Missouri Register, the Missouri Public
Service Commission ("Commission") proposed to rescind and modify 4 CSR 240-2.080. In
Subsection 16 of the proposed rule, the Commission has proposed the following provision:

Parties shall be allowed seven (7) days from the date of filing in
which to respond to any pleading unless otherwise ordered by the
commission.

2. The effect of this proposed change is to reduce from ten (10) to seven (7) days the
amount of time that parties would have to respond to any pleading filed by other parties in a
Commission proceeding. GTE is concerned that this proposed change will make it more difficult
for parties to adequately respond to pleadings, especially when they are served by mail. Often, there
are delays in mail service which effectively reduce the amount of time to prepare, circulate drafts
for client approval, and file responses to pleadings. In addition, when pleadings are filed on Friday,
the weekend period effectively shortens the time to file such responses by two or three days. Even
under the existing 10-day rule, it is often necessary to request extensions of time to respond. GTE
believes the proposal to shorten the response time will only exacerbate the problem of responding
in a timely manner. Therefore, GTE respectfully opposes the proposed change discussed herein.

WHEREFORE, GTE Midwest Incorporated respectfully requests that the Commission decline to adopt the proposed change, as discussed herein, to 4 CSR 240-2.080.

Respectfully submitted,



James M. Fischer, Esq. Mo. Bar No. 27543

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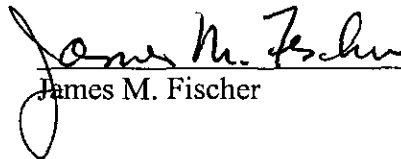
ATTORNEY FOR
GTE Midwest Incorporated

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, postage prepaid, this 1st day of November, 1999, to:

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Dan Joyce
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102



James M. Fischer